

IN THE UNITED STATES DISTRICT COURT
FOR WESTERN DISTRICT OF NORTH CAROLINA

IN THE MATTER OF THE SEARCH OF
PRIORITY MAIL PARCEL BEARING
MAILING LABEL TRACKING NUMBER
9505 5106 9012 1019 0077 99,
CURRENTLY LOCATED AT 2300
YORKMONT ROAD, CHARLOTTE,
NORTH CAROLINA

Case No. 3:21-mj-21

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

The undersigned, being duly sworn, deposes and states:

1. I, Kellie Williams, a United States Postal Inspector currently assigned in Charlotte, North Carolina, am tasked with investigating various offenses, including use of the U.S. Mail to transmit controlled substances in violation of 21 U.S.C. § 841. I have been so employed since 2017. I have received formal classroom training from the U.S. Postal Inspection Service during the twelve-week Postal Inspector Basic Training Academy in Potomac, Maryland. Through my investigations and training, I have become familiar with the methods and techniques employed by individuals committing financial fraud, narcotics smuggling and money laundering of illicit proceeds, as well as other law violations.
2. On January 19, 2021, a Priority Mail parcel bearing USPS tracking 9505 5106 9012 1019 0077 99 (hereafter, “the Suspect Parcel”) was entered into the mail stream in Puerto Rico. The Suspect Parcel was addressed to “Carmen M. Paulino, 329 Red Roan Pl, Charlotte, NC 28215.”
3. On January 25, 2021, Postal Inspectors in Charlotte, North Carolina, found the Suspect Parcel to be suspicious and contacted K-9 Handler Officer Cerdan of the Charlotte Mecklenburg Police Department (CMPD), for further investigation.
4. On January 25, 2021, I attempted to verify the information provided on the Priority Mail parcel label by using law enforcement search databases. I was able to determine the

sender's name is associated with the return address. Further, the recipient's name is associated with the recipient address.

5. The Suspect Parcel is described as follows:
 - A. Addressed to: "Carmen M. Paulino, 329 Red Roan Pl, Charlotte NC 28215"
 - B. From: "Jose J. Nerys, Urb. Rexville Calle 60, Aq-9, Bayamon 00957"
 - C. Size: approximately: 20" X 15" X 10"
 - D. Weight: approximately: 17 pounds, 6.4 ounces
 - E. Postage affixed: \$63.85
 - F. Physical description: brown USPS parcel displaying USPS Priority Mail tape and tracking number 9505 5106 9012 1019 0077 99
6. I am aware, through my training and experience, that people who utilize the U.S. Mail to distribute controlled substances and their proceeds commonly use fictitious names and addresses in an attempt to avoid detection by law enforcement agencies.
7. I am aware, also through training and experience, that people often use the U.S. Mail, specifically Express and Priority Mail, for the delivery of controlled substances for various reasons, some of which are listed below:
 - A. Items sent via Express and Priority Mail are considered to be First-Class Mail. Therefore, these items cannot be examined without a federal search warrant.
 - B. Express and Priority Mail are generally expected to be delivered in one to three days. This assures the sender of expedited delivery.
 - C. Various dispatch times (times which a mailed item is transported to the next destination) are available to customers upon request and provide the sender an opportunity to have some control as to the arrival of the mailed item.
 - D. Individuals desiring to either send or receive controlled substances and payments for these substances through the U.S. Mail can do so without having to provide identification. This reduces the possibility of revealing their true identity.
8. On January 25, 2021, CMPD Drug K-9 Handler, Officer Cerdan was contacted and asked to provide a drug detecting K-9. Officer Cerdan responded to the United States Postal

Inspection Service, located in Charlotte, North Carolina, with drug detecting K-9 Cali, on January 25, 2021.

9. The Suspect Parcel was placed into a lineup. The Suspect Parcel was placed with four separate but similar control parcels at the United States Postal Inspection Service in Charlotte, North Carolina. I observed as K-9 Cali walked among the parcels. K-9 Cali alerted to the Suspect Parcel by sniffing the seams of the Suspect Parcel and responding passively by sitting next to the Suspect Parcel, which is her signal to indicate the scent of a controlled substance. The examination took place at 9:45 a.m. on January 25, 2021.
10. Narcotics Detection K-9 Cali was certified by the National Police Canine Association (NPCA) on July 27, 2018. K-9 Cali was again certified by the NPCA on October 29, 2018, November 4, 2019, and November 3, 2020. K-9 Cali is specifically trained to detect narcotic odors which include marijuana, cocaine, methamphetamine, ecstasy (MDMA), and heroin. During the last 24 months, K-9 Cali has been allowed to sniff a large number of building interiors, vehicles, packages, parcels, and suitcases. Officer Cerdan continues to conduct additional training in order to maintain Cali's proficiency.
11. In my training and experience, cash used to purchase controlled substances is usually kept within close proximity of the controlled substances themselves. As such, it is common for residue from the controlled substances to be found on the cash, providing an odor detectable to trained K-9s, such as Cali.
12. Based on the above facts, I believe that probable cause exists that the Suspect Parcel contains evidence of a crime, contraband, fruits, or other items illegally possessed, or property designed for use, intended for use, or used in committing a crime, in violation of 21 U.S.C. § 841. As such, I respectfully request that a Search Warrant be issued for the Suspect Parcel.

/s/ Kellie R. Williams

Kellie R. Williams

U.S. Postal Inspector

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 26th day of January, 2021, at 2:20 PM

Signed: January 26, 2021



David S. Cayer
United States Magistrate Judge 